

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E**

IN RE:

Friends of the Earth and Sierra Club,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

IN RE:

Request of the Office of Regulatory Staff for Rate Relief to South Carolina Electric & Gas Company's Rates Pursuant to S.C. Code Ann. § 58-27-920.

**SOUTH CAROLINA ELECTRIC & GAS
COMPANY'S
AMENDMENT TO ITS PRE-HEARING
BRIEF**

IN RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., as may be required, and for a prudence determination regarding the abandonment of the V.C. Summer Units 2 & 3 Project and associated customer benefits and cost recovery plan.

South Carolina Electric & Gas (“SCE&G”), by and through the undersigned counsel, hereby submits the following amendment to its pre-hearing brief to the Commission.

I. ADDITIONAL WITNESS SUMMARIES

SCE&G identifies the following additional non-pre-filed witnesses from whom they expect to elicit testimony at the hearing in the Consolidated Dockets, as well as a brief summary of the testimony being sought from each such witness. These are witnesses whose deposition testimony is being sought to be entered even though only taken recently. The deposition transcripts of witnesses identified below are not yet available, but they will be filed as supplemental exhibits in advance of the witnesses’ testimony when each becomes available, and portions of this deposition testimony will be read and/or presented by videographic means at the hearing in the Consolidated Dockets.

A. *C. Dukes Scott (Testimony by Deposition)*

C. Dukes Scott is the former Executive Director of ORS. He can testify concerning his knowledge of the Bechtel Report and its findings, the decision and discussions by ORS concerning settlement of the 2015 and 2016 BLRA proceedings and the decisions and discussions by ORS concerning what to disclose to the Commission in those proceedings, the claim that ORS requested disclosure of the Bechtel documents and the materiality and value of the Bechtel assessment. Mr. Scott’s deposition has not yet been taken.

B. *Allyn Powell (Testimony by Deposition)*

Allyn Powell is former employee of ORS with direct oversight responsibilities for nuclear project oversight. She can testify concerning her knowledge of the Bechtel Report and its findings, the decision and discussions by ORS concerning settlement of the 2015 and 2016 BLRA proceedings and the decisions and discussions by ORS concerning what to disclose to the

Commission in those proceedings, the claim that ORS requested disclosure of the Bechtel documents and the materiality and value of the Bechtel assessment.

C. *Gene Soult (Testimony by Deposition)*

Gene Soult is former employee of ORS with direct oversight responsibilities for nuclear project oversight. He can testify concerning his knowledge of the Bechtel assessment and Report and its findings, the decision and discussions by ORS concerning settlement of the 2015 and 2016 BLRA proceedings and the decisions and discussions by ORS concerning what to disclose to the Commission in those proceedings, the claim that ORS requested disclosure of the Bechtel documents and the materiality and value of the Bechtel findings.

D. *Kevin Marsh (Testimony by Deposition)*

Kevin Marsh is the former Chief Executive Officer of SCANA. Mr. Marsh is expected to testify regarding: (1) the decision to construct the NND Project; (2) the selection of suppliers and designs for the units; (3) the decision to use Westinghouse on the NND Project; (4) the contents of the original and 2015 Amendment to the EPC Contract; (5) licensing, productivity, sub-module delay, design finalization and other challenges and issues faced by the Project; (6) SCE&G's efforts to enforce its rights under the EPC Contract and to motivate the contractors to improve their performance; (7) the NND Project schedule as it evolved over the course of the Project; (8) the retention and other matters related to Bechtel; (8) Fluor's involvement with the NND Project; (9) interactions with Westinghouse and other consortium members, Westinghouse's commitment to the Project and eventual bankruptcy; (10) the role and actions of Santee Cooper related to the NND Project; and (11) other relevant aspects of his involvement with the NND Project as a senior leader of it.

CONCLUSION

For the reasons stated above, SCE&G will seek to present the testimony listed above in its non-pre-filed witness case in this proceeding.

This 8th day of November, 2018.
Cayce, South Carolina

/s/ Belton T. Zeigler

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